

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF ARKANSAS  
TEXARKANA DIVISION**

GLORIA BRADFORD, Individually and  
as Class Representative on Behalf of All  
Similarly Situated Persons; NED  
BURNETT, JR., Individually and as Class  
Representative on Behalf of All Similarly  
Situated persons; SAMUEL  
ALEXANDER, Individually and as Class  
Representative on Behalf of All Similarly  
Situated persons; BOOKS, ETC., by and  
through GLORIA BRADFORD, Class  
Representatives on Behalf of All Those  
Similarly Situated; and STELLA  
PATRICIA SMITH, Individually and as  
Class Representative on Behalf of All  
Similarly Situated persons;

PLAINTIFFS

NO. 4:05-cv-4075 HFB

VS.

UNION PACIFIC RAILROAD  
COMPANY,  
A Delaware Corporation,

DEFENDANT.

(Jury Trial Demanded)

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

**Oral Argument Requested**

The named Plaintiffs and the classes they represent (hereafter the "Class Plaintiffs"), pursuant to the Federal Rule of Civil Procedure (FRCP), Rule 23, hereby move for certification of the following classes: (1) Evacuation Class; (2) Property Damage Class; (3) Economic Loss class, and (4) Liability Issues Class. This Motion is supported by the separate Brief in Support of Motion for Class Certification, filed herewith.

Respectfully submitted this 30 day of June, 2006.

Respectfully Submitted,

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By: s/M. David Karnas  
M. David Karnas

**CERTIFICATE OF SERVICE**

I, M. David Karnas, attorney for Plaintiffs, hereby certify that on the 30th day of June, 2006, I electronically filed the foregoing PLAINTIFFS' MOTION FOR CLASS CERTIFICATION with the Clerk of this Court using the CM/ECF system which will send notification of such filing to the following attorneys:

Attorneys for Defendants:

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By: s/M. David Karnas  
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